

WOODS & AITKEN
L • L • P

SUITE 200
2154 WISCONSIN AVENUE, NW
WASHINGTON, D.C. 20007
TELEPHONE 202-944-9500
FAX 202-944-9501

www.woodsaitken.com

THOMAS J. MOORMAN
Direct Dial: 202-944-9502
E-Mail: tmorman@woodsaitken.com
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of Columbia*

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LINCOLN OFFICE
SUITE 500
301 SOUTH 13TH STREET
LINCOLN, NEBRASKA 68508-2578
TELEPHONE 402-437-8500
FAX 402-437-8558

OMAHA OFFICE
SUITE 525
10250 REGENCY CIRCLE
OMAHA, NEBRASKA 68114-3754
TELEPHONE 402-898-7400
FAX 402-437-898-7401

FILED/ACCEPTED

JAN 27 2009

January 27, 2009

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Suite TW-A325
Washington, DC 20554

ORIGINAL

**Re: EB Docket No. 06-36
Section 64.2009(e) CPNI Certification**

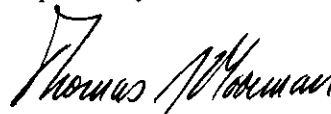
**Ligonier Telephone Company (Form 499-A Filer ID No. 801087)
and
Ligtel Communications, Inc. (Form 499-A Filer ID No. 820726)**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice, DA 09-9, released January 7, 2009, attached for filing is the Section 64.2009(e) Customer Proprietary Network Information certification on behalf of Ligonier Telephone Company (Form 499-A Filer ID No. 801087) and Ligtel Communications, Inc. (Form 499-A Filer ID No. 820726).

Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,



Thomas J. Moorman

Attachments

cc: R. Somers, Enforcement Bureau, FCC
Best Copy & Printing, Inc.

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Local Touch, Global Reach

414 South Cavin Street
Ligonier, IN 46767
260-894-7161

JAN 27 2009

Federal Communications Commission
Office of the Secretary

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2008

Date filed: January 26, 2009

Name of company(s) covered by this certification: Ligonier Telephone Company, Inc. and Ligtel Communications, Inc.

Form 499 Filer ID: 801087 (Ligonier Telephone Company, Inc.) and 820726 (Ligtel Communications, Inc.)

Name of signatory: Donald E. Johnson

Title of signatory: Vice President/General Manager

I, Donald E. Johnson, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. *See attached accompanying statement of operating procedures.*

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The companies currently have no information with respect to the processes pretexters are using to attempt to access CPNI. At this time we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in black ink, appearing to read "Donald E. Johnson", is written over a horizontal line.

Ligonier Telephone Company, Inc. and Ligtel Communications, Inc.

Attachment: Accompanying Statement of Operating Procedures

Per the FCC CPNI rules [C.F.R. § 64.2009(e)] and as referenced in the attached signed certification, Ligonier Telephone Company, Inc. and Ligtel Communications, Inc., herein referenced as the Companies hereby certifies that the Companies [and its affiliates] are in compliance with the FCC CPNI rules and have outlined some of the important operating procedures below in order to ensure the Companies' compliance in the protection of CPNI:

1. CPNI manual has been update in order to account for all FCC CPNI rules and has been adopted by our Companies' board.
2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity.
3. CPNI was not utilized for marketing purposes, however if the Companies should decide to utilize CPNI marketing in the future, the following is in place and will be utilized:
 - a. Established an outbound marketing supervisory review process for the use of CPNI
 - b. Records will be maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year
4. Opt-out method for approval of CPNI use for marketing campaigns is in place, in case CPNI marketing is utilized in the future:
 - a. Customers are notified bi-annually of their rights for the use of their CPNI in marketing campaigns
 - b. New customers are notified of the opt-out procedures as a part of the customer sign-up process
 - c. Billing system clearly displays customer's opting status
 - d. Compliance officer retains CPNI notifications and opting records for at least two years
5. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
 - a. A Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
6. Carrier authentication requirements have been met
 - a. All customers during a customer-initiated telephone care authenticated as being an authorized account contact before discussing CPNI (non-call detail or call detail) without utilizing readily available biographical or account information as defined by the FCC
 - b. Call detail is only released to customers during customer-initiated telephone contact using the following FCC approved methods which are permitted for the release of the requested call detail:

- i. Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our companies files for at least 30 days)
 - ii. Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
 - iii. Having customer come in to Companies' office and provide a valid government issued photo ID
- 7. We provide immediate notice to customer of particular account changes
- 8. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
- 9. Addition protection measures are taken above and beyond the current FCC CPNI rules
 - a. Companies takes reasonable measures to discover and protect against activity that is indicative of pretexting
 - b. Companies maintains security of all CPNI, including but not limited to:
 - i. Documents containing CPNI are shredded
 - ii. Computer terminals are locked employee is not the their station

ANNUAL CERTIFICATION

I, Donald E. Johnson, Vice President and General Manager of Ligonier Telephone Company, Inc. and Ligtel Communications, Inc. (Companies) in accordance with C.F.R. § 64.2009(e) that the Companies are in compliance with the FCC Rules set forth at 47 C.F.R. § 64, Subpart U. This information is true and accurate to the best of my knowledge, information, and belief.



Signature



Date